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25 **UNITED STATES BANKRUPTCY COURT
26 NORTHERN DISTRICT OF CALIFORNIA
27 SAN FRANCISCO DIVISION**

28 **In re:**

29 **PG&E CORPORATION,**

30 **- and -**

31 **PACIFIC GAS AND ELECTRIC
32 COMPANY,**

33 **Debtors.**

34 Affects PG&E Corporation
35 Affects Pacific Gas and Electric
36 Company
37 Affects both Debtors

38 ** All papers shall be filed in the Lead
39 Case, No. 19-30088 (DM).*

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54 Bankruptcy Case No. 19-30088 (DM)

55 Chapter 11
56 (Lead Case) (Jointly Administered)

57 **DECLARATION OF ROBB MCWILLIAMS
58 IN SUPPORT OF REORGANIZED
59 DEBTORS' THIRTY-FIFTH SECURITIES
60 CLAIMS OMNIBUS OBJECTION TO THE
61 BAUPOST AMENDMENT**

1 I, Robb McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP
5 (“AlixPartners”), which is an affiliate of both AlixPartners, LLC and AP Services, LLC (“APS”).
6 APS was previously retained to provide interim management services to PG&E Corporation and
7 Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, “**PG&E**,” the
8 **“Debtors**,” and as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-
9 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit this Declaration in support of the
10 *Reorganized Debtors’ Thirty-Fifth Securities Claims Omnibus Objection To The Baupost*
11 *Amendment* (the “**Omnibus Objection**”), filed contemporaneously herewith.¹

12 2. In my current position, I am responsible for overseeing the bankruptcy case
13 management component of AlixPartners’ assignment to assist the Reorganized Debtors with
14 various matters related to these Chapter 11 Cases. My areas of responsibility include (a) the effort
15 by AlixPartners, in coordination with the Reorganized Debtors, to review and assess the validity
16 of all claims asserted against the Debtors, other than Fire Claims and Subrogation Wildfire Claims,
17 and (b) providing support with respect to Securities Claims. I am generally familiar with the
18 Reorganized Debtors’ day-to-day operations, financing arrangements, business affairs, and books
19 and records. Except as otherwise indicated herein, all facts set forth in this Declaration are based
20 upon my personal knowledge, the knowledge of other AlixPartners professionals working under
21 and alongside me on this matter, my discussions with the Reorganized Debtors’ personnel and the
22 Reorganized Debtors’ various advisors and counsel, and my review of relevant documents and
23 information. If called upon to testify, I would testify competently to the facts set forth in this
24 Declaration. I am authorized to submit this Declaration on behalf of the Reorganized Debtors.

25 3. The AlixPartners team under my supervision has been actively and intimately
26 involved in the claims review and reconciliation process. AlixPartners initially assisted the Debtors

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28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
in the Omnibus Objection.

1 in the preparation of their bankruptcy schedules based on the Debtors' books and records.
2 AlixPartners is now supporting, and will continue to support, the efforts of the Reorganized
3 Debtors and their counsel to resolve disputed claims, including by formal objections as necessary.

4 4. As part of the claims review and reconciliation process, the AlixPartners team,
5 working with the Reorganized Debtors' personnel and other professionals, identified a number of
6 proofs of claim filed by Baupost Group Securities, L.L.C. The Omnibus Objection is directed to
7 those claims, which are identified in **Exhibit A** attached to the Omnibus Objection, in the column
8 headed "Claims to Be Disallowed and Expunged."

9 5. **Exhibit A** to the Omnibus Objection was prepared by the AlixPartners team under
10 my overall supervision, and I am familiar with the document, its contents, and the process under
11 which it was prepared.

12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
13 and correct to the best of my knowledge, information, and belief.

14

15 Executed December 13, 2023 in Dallas, Texas.

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17 */s/ Robb McWilliams*
18 Robb McWilliams
19 Partner and Managing Director
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